

## **ATTACHMENT A**

### **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Jeramie Middlestead, being first duly sworn, depose and state as follows

#### **INTRODUCTION AND AGENT BACKGROUND**

1. I am a Detective with the Big Horn County Sheriff's Office and a Task Force Officer (TFO) with the United States' Drug Enforcement Administration (DEA). I began working for the Big Horn County Sheriff's Office in January of 2014 as a patrol deputy, until becoming a Detective in 2018. I was deputized as TFO with DEA on January 7, 2020. I have received formal training by the State of Montana Law Enforcement Academy as well as private sector training programs in conducting felony and misdemeanor investigations of crimes. I currently hold an Intermediate Peace Officer Certification in the State of Montana.
2. My duties and responsibilities as a TFO with DEA include participating in the investigation and prosecution of persons who violate federal drug laws. As a result of my training and experience, I am familiar with federal laws prohibiting the possession, manufacturing, and distribution of controlled substances under Title 21 of the United States Code.
3. As a result of my experience and training, I have conducted and/or participated in many investigations, to include, but not limited to, physical and electronic

surveillances, questioning of witnesses, suspects, and informants, the application and execution of search, seizure, and arrest warrants, evidence collection, financial crimes, and recognition of controlled substances. I also have training and experience in the recognition of paraphernalia used for ingesting, distributing, manufacturing, and storing controlled substances, as well as recognizing conduct common to drug traffickers.

4. Your Affiant is involved in the investigation of a suspected violation of Federal law(s) by William Paul JEFFERSON. (DOB: 11-XX-1985).

**DESCRIPTION**

5. This Affidavit is submitted in support of a Criminal Complaint requested for William Paul JEFFERSON, charging him with possession with intent to distribute 50 grams or more of a mixture or substance containing a detectible amount of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1). The statements in this Affidavit pertain to the investigation described below and are based in part on information provided by my own observations and experience, and the observation and experiences of other fellow law enforcement officers participating in the investigation. This Affidavit does not purport to contain all the facts related to this investigation, but only those facts necessary to establish probable cause with respect to the aforementioned offense.

**PROBABLE CAUSE**

6. During a traffic stop in Lodge Grass, MT on October 6, 2021, BIA officers discovered Mary Amyotte in possession of 36 grams of pure methamphetamine. In a *Mirandized* interview following the vehicle search, Amyotte stated that William Paul JEFFERSON “fronted” the methamphetamine for her to sell; that is, according to their agreement, Amyotte had to pay JEFFERSON \$2,000 for the drugs he had given her, and she could keep anything she made over that \$2,000. Amyotte stated that JEFFERSON is a well-known meth dealer.
7. In the course of the investigation of JEFFERSON, law enforcement spoke to at least 3 other individuals who identified JEFFERSON as a meth dealer, two of whom admitted to either buying or receiving meth from him at different times in 2021. One of these witnesses also saw JEFFERSON with what he estimated were ounce quantities of meth at JEFFERSON’S residence on two different occasions—March 4, 2022, and March 12, 2022.
8. The DEA executed a federal search warrant on March 24, 2022, at JEFFERSON’S residence, a multi-story house approximately 1.39 miles north of Wyola, MT on HWY 451. As law enforcement approached the residence to execute the warrant, one or more of the home’s occupants was alerted that law enforcement was approaching the house. As a witness inside the house told the agents in a post-search interview, the alert prompted JEFFERSON and his

girlfriend, Jayne Kennedy, to begin disposing of the meth located in the residence in the toilet. At this point in time, investigators suspect that one or more people inside the house received the warning about the approaching police by cellphone.

9. DEA agents located several torn bags in the bathroom that contained methamphetamine residue and recovered additional residue from in and around the toilet. With packaging, the meth recovered from the bathroom weighed about 65.3 grams. Agents also recovered 807.4 grams of liquid from inside the toilet that tested positive for methamphetamine.
10. During their search of the residence, investigators determined that JEFFERSON lives in a bedroom on the bottom floor. Adjacent to that bedroom is the bathroom where agents discovered that meth had been disposed of in the toilet.
11. Investigators also recovered, among other items, the following evidence related to meth possession and distribution (all weights include packaging): several baggies containing approximately 33.3 grams of suspected methamphetamine; another bag containing 38 grams of suspected methamphetamine; an "Altoids" mints tin containing several small packages of user quantities of suspected methamphetamine, weighing approximately 79.3 grams; 2 digital scales with meth residue on them; baggies with meth residue inside; 2 rifles with rounds in the magazines; 2 paper user-quantity packages—1 containing 29.3 grams of

suspected methamphetamine and the other containing suspected methamphetamine residue.

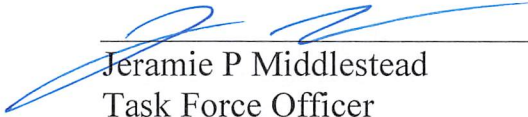
12. During the search, agents spoke with the owner of the residence, Arthur Plentyhawk, Jr. Plentyhawk admitted to purchasing \$20 of meth from JEFFERSON while at the house on March 23, 2022, the day before the search. Plentyhawk stated JEFFERSON lives downstairs, has resided at the residence for approximately one year, and during that time, JEFFERSON had been distributing methamphetamine. According to Plentyhawk, JEFFERSON has multiple methamphetamine customers who meet JEFFERSON either outside the residence, or in town. Plentyhawk stated that neither Plentyhawk nor Plentyhawk's spouse own any guns within the residence, and that if there were any guns in the residence, the guns would be found in JEFFERSON's room.

### **CONCLUSION**

13. Based on my training and experience, and the foregoing facts, I believe there is probable cause that William Paul JEFFERSON possessed with the intent to distribute 50 grams or more of a mixture or substance containing a detectible amount of methamphetamine – a Schedule II controlled substance – in violation of Title 21, United States Code, Section 841(a)(1), in the State and District of Montana.

14. I swear that the facts presented herein are true and accurate to the best of my knowledge.


Respectfully submitted,



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Jeramie P Middlestead  
Task Force Officer  
Drug Enforcement Administration

Subscribed and sworn to before me on March 25, 2022:



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Timothy J. Cavan  
United States Magistrate Judge  
District of Montana